



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 31 2000

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for Operable Unit 4 of the Fernald Environmental Management Project Superfund Site

FROM: Bruce K. Means, Chair
National Remedy Review Board

A handwritten signature in dark ink, appearing to read "B. Means", is written over the name "Bruce K. Means" in the "FROM" field.

TO: William E. Muno, Director
Waste Management Division
EPA Region 5

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed Superfund cleanup action for Operable Unit 4 of the Fernald Environmental Management Project Superfund Site. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

The Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control response costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions prior to their being issued for public comment. The board reviews all proposed cleanup actions that exceed its cost-based review criteria.

The NRRB review evaluates the proposed actions for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, state/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate regional decision maker. The region will then include these recommendations in the Administrative Record for the site before it issues the proposed response action for public comment. While the region is expected to give the board's recommendations substantial weight, other important

factors, such as subsequent public comment or technical analyses of response options, may influence the final regional decision. The board expects the regional decision maker to respond in writing to its recommendations within a reasonable period of time, noting in particular how the recommendations influenced the proposed cleanup decision, including any effect on the estimated cost of the action. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

Overview of the Proposed Action

The Department of Energy (DOE) proposes to change the treatment component of the remedy for Operable Unit 4 of the Fernald Environmental Management Project in Fernald, Ohio. The remedy will now call for chemical stabilization of approximately 9000 cubic yards of waste contaminated with radioactive elements and metals, and stored in silos at the facility. Chemical stabilization will allow the wastes to meet the waste disposal criteria required for disposal of the residuals at the DOE Nevada Test Site.

NRRB Advisory Recommendations

The NRRB reviewed the informational package for this proposal and discussed related issues with EPA site manager Gene Jablonowski on March 15, 2000. Based on this review and discussion, the board offers no comments or recommendations on this proposed action.

The NRRB appreciates the region's efforts to work closely with DOE, the state, and community groups at this site. We encourage Region 5 management and staff to work with their regional NRRB representative and the Region 5/7 Accelerated Response Center in the Office of Emergency and Remedial Response to discuss any appropriate follow-up actions.

Thank you for your support and the support of your staff in preparing for this review. Please give me a call at 703-603-8815 should you have any questions.

cc: S. Luftig
T. Fields
B. Breen
J. Woolford
C. Hooks
R. Hall
OERR Regional Center Directors